

To: [Contractor's Project Manager]

Subject: Contractor IT Personnel Security Program Requirements and Designations

Authority: Chapter VII: *Personnel Security/Suitability and Training*, of the *HHS Automated Information Systems (AIS) Security Program Handbook* (see link below).

Reference: Chapter VII: *Personnel Security/Suitability and Training*, of the *HHS Automated Information Systems (AIS) Security Program Handbook* (<http://www.oirm.nih.gov/policy/aissp.html>) implements 5 CFR Sections 731, 732, and 736, Executive Order 10450; and OPM regulations and describes the Department's AIS Personnel Security Program. Chapter VII provides guidance for determining the position sensitivity designations for all positions with access to the Department's AIS resources, outlines the requirements for background investigations of employees in sensitive positions, describes how to deal with adverse security reports, and presents the requirements for AIS security training.

NIH/CIT has requested that all NIH ICs immediately ensure compliance with the existing HHS requirements for obtaining background investigations and clearances for all FTEs in IT/IRM positions. The policy and process applies to all DHHS and contractor personnel who have access to or participate in the design, development, operation, or maintenance of the Department's automated information systems.

By virtue of the type of work your organization performs for NIEHS, the following security level designations apply:

[list employees and their designations here]

Therefore, please ensure that these employees complete a background investigation package consisting of four forms:

- FD-258, Fingerprint Chart: You may direct that the employees individually stop by the Security office near the 101 Building lobby to have their fingerprint cards completed. These cards must remain in near perfect condition and their chain of custody has to be established; therefore, the Security office will hold these cards for the NIEHS project officer to collect.
- Standard Form 85P, attached. See 'tips', below.
- HHS Credit Release Form, attached.
- OF Form 306, Declaration for Federal Employment, attached.

If an employee has already undergone this investigation, they may contact the prior holder of such records and get a copy of the suitability determination for submission. If the record is appropriate and within a reasonable time frame, the contractor may include those results with their new OPM package. An existing determination will only be satisfactory for satisfying these requirements if the prior investigation is from OPM and of the same clearance level (or higher) as their current position. Also, when a contractor leaves, the individual leaving, through his/her Project Manager, may request copies of the related records from the PO for their own records.

The security background investigation 'package' will not be considered to be complete until all four forms are completed by each contractor and provided to the Project Officer. If possible, similar investigations should be sent together for easier submission to NIH. They are due no later than _____.

Only three officials are authorized to review the package in depth before or after submission to OPM: the NIEHS review authority (the Project Officer), the NIH/DERT review authority, and the HHS review authority. All three review for completeness of the form only. Additionally, the PO retains the designation records after the process is completed. Contractors and their employees are urged to retain their own copies of the actual forms submitted since NIEHS will not retain any copies.

NIH CIT will be reviewing our compliance with these requirements on a periodic basis. OPM will conduct the investigations.

Tips for Completing the SF-85P Form: *This form can be time consuming to complete, so we recommend that this activity be started right away. There are many contacts that must be identified and the information for each must be complete. Your employees must fill in every 'requested' blank – the form will be rejected if any answers are missing. They can write 'N/A' in a blank (e.g., relative to two citizenships, or other names they go by) if there is nothing to note. They may also note on the form that they 'Do not remember' or provide a similar comment, but a response is required to every requested question and all information on the form must be complete and specific. The OPM investigators who review the forms will be contacting each person identified on these forms by mail or telephone, so the employees should be directed to ensure that the information provided is up to date. Please read the instructions thoroughly. For example, instruction #4 explains that you must initial and date changes made after the form is signed. If you have many handwritten corrections on your form not initialed and dated, the form will be rejected because the reviewer cannot determine when they were made. Common mistakes are:*

- *No initials and date for each scratch out/correction on the forms*
- *Not filling in each blank requested and with complete information*
- *Item 5 needs to note 'N/A' or list something*
- *Item 8 needs to show the choice, item b, and, if a US Citizen, please note 'N/A' or information in 8d (do not leave it blank).*
- *Missing a checkbox or an area code for a phone number.*
- *Full information for each reference name you begin – if you start a reference, make sure you list each requested blank or write in 'do not know'.*
- *Social Security Number with each page.*
- *Item 10 has confusing instructions – just list all degrees in full to avoid questions.*
- *Watch out and explain any areas of overlap or periods of no employment. You must show the period of unemployment as its own notation.*
- *When a date is 'to' today, note 'to' 'present'.*
- *There is a special number for ALL selective service individuals. Use <https://www.sss.gov/> to note the actual unique number for your registration – example: '62 – 1386812 – 9'*
- *There is a medical release to sign inside the primary form which also requires a signature.*

- *The “Declaration for Federal Employment” must be filled out by contractors. Section 18 of the AF 306 may not apply and be left blank.*
- *You should write in statements such as ‘do not remember’ rather than leave a requested area blank.*
- *If applicable, try to retrieve military records such as DD Form 214 for information because the investigator will do so and use those dates.*
- *The fingerprint cards must be nearly flawless to be accepted. Make sure the original document remains unbent and the prints remain very clear.*
- *Again mark applicable checkboxes every time requested to avoid processing delays.*

Please let me know if you have any questions or concerns.